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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Approximately 69,370 Bitcoin (BTC), Bitcoin  
Gold (BTG), Bitcoin SV (BSV), and Bitcoin  
Cash (BCH) seized from  
1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhx

Defendant.

First 100, LLC, 1st One Hundred Holdings,  
LLC, and Battle Born Investments  
Company, LLC,

Claimants.

CASE NO. CV 20-7811 RS

**STIPULATION TO UNSEAL THE CLAIMS  
AND ANSWERS OF CLAIMANTS BATTLE  
BORN INVESTMENTS COMPANY, LLC,  
FIRST 100, LLC AND 1ST ONE HUNDRED  
HOLDINGS, LLC; [PROPOSED] ORDER**

1 Pursuant to Civil L.R. 7-12, Plaintiff United States of America (“United States”), and Claimants  
2 Battle Born Investments Company, LLC; First 100, LLC; and 1st One Hundred Holdings, LLC  
3 (collectively and hereinafter, “Claimants”), by and through their respective counsel, hereby stipulate to  
4 the following:

5 WHEREAS on March 16, 2021 Claimants filed an administrative motion to file their claims  
6 under seal (*see* Dkt. No. 62);

7 WHEREAS on April 5, 2021 Claimants filed an administrative motion to file their answers  
8 under seal (*see* Dkt. No. 64);

9 WHEREAS the reason provided for Claimants’ requests is that Claimants believe that the  
10 content of those documents “relate to or may reveal the identity of the ‘Individual X’ referenced in the  
11 First Amended Complaint filed by the United State Attorney’s Office in this action” (*see* Dkt. Nos. 62  
12 and 64);

13 WHEREAS Claimants filed redacted versions of their claims and answers in the public record  
14 and filed under seal unredacted versions of those documents;

15 WHEREAS this Court granted Claimants’ administrative requests to file their claims and  
16 answers under seal in light of the concerns related to Individual X (Dkt. Nos. 63, 65);

17 WHEREAS the United States has taken the position that nothing in the redacted portions of  
18 Claimants claims or answers relates to or reveals the identity of Individual X and therefore, in its view,  
19 there is no concern regarding the confidentiality of that individual and accordingly no need to withhold  
20 the information in Claimants’ filings from the public record;

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1 NOW, THEREFORE, the parties hereby stipulate that Claimants claims and answers—  
2 specifically, Dkt. Nos. 62-5 (First 100 LLC claim), 62-6 (Battle Born claim), 64-5 (Verified Answer of  
3 Battle Born), 64-6 (Answer of First 100 Claimants)—shall be unsealed and filed in the public record in  
4 their entirety and without redactions.

5 IT IS SO STIPULATED.

6 DATED: July 12, 2021

STEPHANIE M. HINDS  
Acting United States Attorney

7  
8 /s/ Claudia A. Quiroz  
DAVID COUNTRYMAN  
CHRIS KALTSAS  
CLAUDIA A. QUIROZ  
WILLIAM FRENTZEN  
Assistant United States Attorneys

11  
12 DATED: July 12, 2021

FOX ROTHSCHILD LLP

13 /s/ Dwight Craig Donovan  
14 DWIGHT CRAIG DONOVAN  
Attorneys for Claimants  
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**[PROPOSED] ORDER**

GOOD CAUSE APPEARING and per the parties' stipulation, IT IS HEREBY ORDERED that the claims and answers of Claimants Battle Born Investments Company, LLC; First 100, LLC; and 1st One Hundred Holdings, LLC shall be unsealed and filed in the public record in their entirety and without redactions. The documents to be unsealed are the following: Dkt. Nos. 62-5 (Unredacted version of First 100 LLC claim), 62-6 (Unredacted version of Battle Born claim), 64-5 (Unredacted Verified Answer of Battle Born), 64-6 (Unredacted Verified Answer of First 100 Claimants).

IT IS FURTHER ORDERED THAT the Office of the Clerk shall unseal these documents and file them in the public record.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: July \_\_, 2021

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HONORABLE RICHARD SEEBORG  
UNITED STATES CHIEF DISTRICT COURT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was filed with the Court and electronically served through the CM-ECF system which will send a notification of such filing to all counsel of record.

DATED: July 13, 2021

STEPHANIE M. HINDS  
Acting United States Attorney

By: /s/ Claudia A. Quiroz  
CLAUDIA A. QUIROZ  
Assistant United States Attorney